REF: 8WM-DW

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6.7001

Mr. Jake Eisel Century Oil and Gas Corporation 7887 East Belleview, Suite 800 Englewood, Colorado 80111

Dear Mr. Eisel:

You are hereby requested to submit permit applications for the following wells by July 30, 1984:

Field

Well Name

NW Poplar

Goings No. 1 Vickers No. 6-15 Clark No. 1 Cox No. 1

EPA is requiring permit applications for these wells for the following reasons: 1)The agency has determined that salt water disposal (SWD) wells pose a significant threat to Underground Sources of Drinking Water (USDW's) in this area and is therefore permitting them as soon as possible and; 2)EPA has received assertions from the Bureau of Indian Affairs (BIA) of ground water contamination as a possible result of salt water disposal activities on the Fort Peck Indian Reservation. Since the East Poplar and Northwest Poplar fields are the area of greatest concern to the tribe and the BIA, we are requesting that permit applications for wells from these fields be submitted first.

Please complete one of the enclosed application forms for each well listed by July 30, 1984. Be sure that all the applications are complete and that all required attachments are included. Submit the completed applications to:

Chief, Drinking Water Branch U.S. Environmental Protection Agency (8WM-DW) 1860 Lincoln Street Denver, Colorado 80210 The SWD wells led above may continue to operatunder current authorization by rule until:

The effective date of a permit (activities will then be authorized by permit);

The denial of a permit (the well will no longer be authorized to inject); or

The owner or operator fails to submit the permit application within the time period specified in this notice (at which time the authorization to inject will be revoked).

I encourage you to contact either Richard Long in the EPA Denver Regional Office (Phone: (303) 844-3914) or William Engle in the EPA Montana Operations Office (Phone: (406) 449-5414) as soon as possible if you have any questions.

Sincerely yours,

John F. Wardell, Director, Montana Operations Office

Enclosures: Permit Application Forms

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Sent to Jack B. Mc Williams

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SCENTING P. CII and Cas

Postage Postage Wood, Colorade 20111

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Feturn Receipt Showing to whom and Date Delivery Fee

Return receipt showing to whom Date, and Address of Delivery

TOTAL Postage and Fees

Postmark or Date

Postmark or Date

AUG 2 1 1984

8WM-DW

Ref:

Jack B. McWilliams
Century Oil and Gas Corporation
7887 East Belleview Avenue
Englewood, Colorado 80111

Re: Underground Injection Control (UIC)
Permit Applications for:
Vickers #1 SWDW (Per. No. MTS21PR-0002)
Goings #1 SWDW (Per. No. MTS21PR-0003)
Clark #1 SWDW (Per. No. MTS21PR-0004)

Dear Mr. McWilliams:

On July 30, 1984, we received your applications for UIC permits to allow the injection of produced brine into the above-referenced wells in the Northwest Poplar field, Montana. We have determined that there are a number of deficiencies and/or parts missing from the applications, and will not be able to declare the applications complete and begin processing your application until they have been received. Certain deficiencies are common to all three of the applications and they are listed below. Deficiencies specific to each well follow the general listing under the well name. The problems that must be addressed on each of the three permit applications are as follows:

- 1. SIGNATORY: The person who signs the permit application must be either: 1) A principal executive officer of at least the level of a Vice-President or; 2) A duly authorized representative so identified in writing by a Vice-President or higher. See 40 CFR Section 144.32 (a) and (b).
- 2. DESCRIPTION OF INJECTION OPERATION: In the interest of expediency and clarity, please submit a brief (one or two paragraph) description of each injection operation (e.g., Well # A is injecting into the X formation and the injection fluid will be composed of produced water from well #'s B and C, producing from the Y formation). See 40 CFR Section 144.31(e)(1).
- 3. AREA OF NOTIFICATION: You are required to give separate notice of intent to apply for a permit to each owner or tenant of the land within a quarter-mile of the subject well. See 40 CFR Section 147.1355(b). When you have given notice, please submit a list of the names and addresses of the owners of record to whom you have sent notice to this office.

80M-DW .

SOUTH SUNDY

8RC Hobson B/16/84

*5

- 4. INDIAN LANDS: All three wells are located at 29N, 50E (Sections 6, 20 and 27). It appears from our maps that all three are located on the Fort Peck Indian Reservation, yet you indicate that only the Goings #1 is on Indian Lands. Please clarify. Permit applicants for injection wells on or within one-half mile of Indian Lands must extend the area of notification to one-half mile of the subject well. See 40 CFR Section 147.1355(c).
- 5. NAME AND DEPTH OF USDW's: Attachment E (Name and Depth of USDW) requires a submittal of data on USDW's which may be affected by the injection operation. It is EPA policy to expect that any Underground Source of Drinking Water (USDW) overlying an injection zone has the potential for becoming contaminated by that injection. The data submitted as Attachment E is inadequate for our review procedures. There are other USDW's overlying injection zones besides the Judith River (e.g., Fox Hills, Hell Creek, and the Fort Union, all of which meet the definition of a USDW). Please elaborate on your submittals for each permit, giving us the geologic name and depth to the bottom of all USDW's occurring above the injection zones.
- 6. GEOLOGICAL DATA ON INJECTION AND CONFINING ZONES: With reference to Attachment 6 (Geologic Data), the geologic data submitted must be expanded upon. Please submit, in narrative form, the appropriate geologic data on the injection zone and confining zones including: lithologic description; geological name; thickness; depth and fracture pressure (and how the fracture pressure was determined). If possible, please submit a local geological map plus a site-specific stratigraphic column.
- 7. OPERATING DATA: Attachment H (Operating Data) requires that the average and maximum daily injection rate, volume and pressure be established in the permit application. You have stated the average rate, volume and pressure, but not the maximum. Please do so for each well.

WELL-SPECIFIC DEFICIENCIES

In addition to addressing the issues mentioned above for all three wells, please respond to the well-specific issues listed below:

VICKERS #1

- 1. You have submitted well data for all wells within a one-mile radius of the subject well as Attachment C (Corrective Action). One of the those wells is the Tribal #1. The data submitted is unclear. Who owns/operates the Tribal #1? Is it an active producer at this time? If not, what is its status?
- 2. In Attachment H (Operating Data), you state that water analyses for the two injection source wells are attached. One of the source wells referenced is the Mason #7-16, but no analysis is included for that well. Please submit this analysis or explain why it was not available.

GOINGS #1

- 1. Since you have stated that the Goings #1 is located on Indian Lands, please indicate whether or not there is a current Bureau of Land Management permit for this well. If there is such a permit, include the permit number.
- 2. With regard to your submittal for Attachment A (Area of Review Methods), the top portion of the topographic map in Exhibit I is missing. This missing portion is within the one-mile radius of the subject well. Please submit a new topographic map with the missing portion added. In addition, the maps submitted as Exhibit I and Exhibit II do not agree with each other. Specificially, the plotting of wells 27-1 and 27-3 is different on each map. Please check your plotting and resubmit.

CLARK #1

- 1. Because the Clark #1 had not commenced injection prior to September 2, 1983 (which is the date of publication for the proposed UIC regulations, and the cut-off date for "grandfathering in" aquifer exemptions for existing wells), you may need an aquifer exemption in addition to a permit. Aquifers with less than 10,000 mg/l total dissolved solids qualify as USDW's and must receive an exemption before EPA can issue a permit to inject (see 40 CFR Sections 144.7 and 146.4). The Goings #1 and the Vickers #1, which commenced injection on 3/22/82 and 4/1/83, respectively, were included on our initial injection well inventory and were granted automatic aguifer exemptions upon UIC program approval. In order to determine whether or not an aquifer exemption is necessary, we will need further information on the injection zone including water quality and water use. A copy of the UIC Fact Sheet on aquifer exemptions is attached. If an aquifer exemption is required for the Clark #1 well, continued use of the well is a violation of the Safe Drinking Water Act which subjects you to a penalty of up to ten-thousand dollars (\$10,000) per day of noncompliance (per 40 C.F.R. Section 144.12).
- As soon as we receive all the information listed above, we will be able to proceed with processing the permits and the aquifer exemption. Please submit the required information to the Denver Regional office as soon as possible, but no later than September 6th. If you have any questions regarding this letter, or on the status of your applications, please contact Laura Clemmens (for the Vickers #1 well) at (303)844-2731 or Jim Boyter (for the Goings #1 and Clark #1 wells) at (406)449-5486.

Sincerely,
One signed
John G. Welles
John G. Welles
Regional Administrator

File: Century 0+6 Denver Office



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

1860 LINCOLN STREET DENVER, COLORADO 80295-0699

Ref: 8M0

JAN 17 1985

Mr. Jack B. McWilliams Century Oil and Gas Corporation 7887 East Belleview Avenue Englewood, Colorado 80111

Re: Underground Injection Control

(UIC) Permit for Goings #1 Well

Permit Number: MTS21PR-0003

UIC permit and Aquifer Exemption

for Clark #1 Well

Permit Number: MTS21PR-0004

Dear Mr. McWilliams:

Attached are copies of the Draft UIC Permits and Statements of Basis for the Goings #1 Well and the Clark #1 Well in Roosevelt County, Montana. A Draft Aquifer Exemption is also included for the Clark #1 Well.

Notices should appear soon in the Billings Gazette and the Wolf Point Herald News notifying the public of the opportunity to comment on the draft permit. Separate notices have also been sent to surface land owners within the area of review.

Please note that this is <u>your</u> opportunity to carefully inspect these documents and be sure that you are aware of and agree with all the permit conditions stated therein. The public comment period will run until February 15, 1985. If you have any questions on this action, please call Jim Boyter at (406) 449-5486.

Sincerely,

Max H. Dodson, Director Water Management Division

Attachments

P 725 767 474

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED NOT FOR INTERNATIONAL MAIL

(See Reverse)

* U.S.G.P.O. 1983-403-517	Street and No. E. Bellurius Que. P.O., State and ZIP Code					
J.S.G.P.	Postage	\$				
*	Certified Fee					
	Special Delivery Fee					
	Restricted Delivery Fee					
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Feb.	TOTAL Postage and Fees	\$				
PS Form 3800, Feb. 1982	Postmark or Date					

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED NOT FOR INTERNATIONAL MAIL

Sent to Jack B. Mc Williams

Scent to Jack B. Mc Williams

Figure Ave.

Finglewood, Colorade, 80111

Solution Receipt Showing to whom, Date, and Address of Delivery

Total Postage and Fees

Postmark or Date

Ref: 8WM-DW

Ref: 8WM-DW

Jack B. McWilliams
Century Oil and Gas Corporation
7887 East Belleview Avenue
Englewood, Colorado 80111

Re: Underground Injection Control (UIC)
Permit Applications for:
Vickers #1 SWDW (Per. No. MTS21PR-0002)
Goings #1 SWDW (Per. No. MTS21PR-0003)
Clark #1 SWDW (Per. No. MTS21PR-0004)

Dear Mr. McWilliams:

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80m-DW 977 Long

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- 6. GEOLOGICAL DATA ON INJECTION AND CONFINING ZONES: With reference to Attachment G (Geologic Data), the geologic data submitted must be expanded upon. Please submit, in narrative form, the appropriate geologic data on the injection zone and confining zones including: lithologic description; geological name; thickness; depth and fracture pressure (and how the fracture pressure was determined). If possible, please submit a local geological map plus a site-specific stratigraphic column.
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Sincerely,
Onional signed
John G. Welles
John G. Welles

Regional Administrator

Permit Application & Attachments (P&A Approval Request)

Correspondence to EPA

27 029N 050E Well Located: NENW 27 029N
FORT PECK
POPLAR, NW, ROOSEVELT County
GOINGS #1 SWDW
MT00003

MT2003-0003

NENW.

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Jack B. McWillians, Production Manager

EPA REGION VIII DRINKING WATER BRANCH

(303) 694-1953

Jares 17. 1988

ATTACHMENTS TO FORM 4 Goings #1 SWDW

- A. AREA OF REVIEW METHODS (Exhibit I)
 - fixed radius of 1/4 mile from the wellbore (Montana)
- B. MAPS OF WELLS/AREA AND AREA OF REVIEW (Exhibits I, II, III)
 - topographic map and disposal facility layout
- C. CORRECTIVE ACTION PLAN AND WELL DATA (Exhibits IV, V, VI, VII)
 - well data for all wells within one mile: Goings #27-3,
 Goings #1 SWDW, Robbins #22-15, Goings #27-1
- D. MAPS AND CROSS SECTIONS OF USDWS
 - does not apply to Class II wells
- E. NAME AND DEPTH OF USDWS (Class II) (Exhibit VIII)
 - geologic name and depth to bottom of all underground sources of drinking water
- F. MAPS AND CROSS SECTIONS OF GEOLOGIC STRUCTURE OF AREA
 - does not apply to Class II wells
- G. GEOLOGICAL DATA ON INJECTION AND CONFINING ZONES (Class II) (Exhibit VIII)
 - geologic data on injection zone and lithologic description, geological name, thickness, depth and fracture pressure
- H. OPERATING DATA (Exhibits IX, X)
 - operating data and disposal fluids characteristics
- FORMATION TESTING PROGRAM
 - does not apply to existing Class II wells
- J. STIMULATION PROGRAM
 - no stimulation program proposed
- K. INJECTION PROCEDURES (Exhibit XI)

Attachments to Form 4 Goings #1 SWDW Page Two

- L. CONSTRUCTION PROCEDURES (Exhibit XII) .
- M. CONSTRUCTION DETAILS (Exhibit XII)
- N. CHANGES IN INJECTED FLUID
 - Class III wells only
- O. PLANS FOR WELL FAILURES (Exhibit XIII)
 - contingency plans
- P. MONITORING PROGRAM
 - daily pumper visual inspection
- Q. PLUGGING AND ABANDONMENT PLAN (Exhibit XIV)
- R. <u>NECESSARY RESOURCES</u> (Exhibit XV)
- S. AQUIFER EXEMPTIONS
 - not applicable
- T. EXISTING EPA PERMITS
 - none
- U. DESCRIPTION OF BUSINESS (Exhibit XVI)

UNITED STATES ENVIRONMENTAL PROTECTION (NO. 20460)

EXHIBITXIV

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EPA Form 7520-14 (3-84)

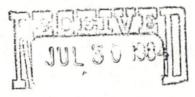


Century Oil & Gas Corporation

Suite 800 7887 E. Belleview Avenue Englewood, Colorado 80111

Phone 303 694-1533 RCA Telex 216149

July 17, 1984



EPA REGION VIII DRINKING WATER ERANCH

Chief, Drinking Water Branch U. S. Environmental Protection Agency (WM-DW) 1860 Lincoln Street Denver, Colorado 80295

> Re: Permit Applications for Century Oil & Gas Corporation Produced Water Disposal Wells Goings #1, Vickers #1, Clark #1 Northwest Poplar Field

Roosevelt County, Montana

Gentlemen:

Further to that letter request of June 20, from John F. Wardell (REF: 8WM-DW) and my telephone conversation with Richard Long of July 11, please find enclosed completed applications for the subject wells referenced above. As the Cox #1 salt water disposal well, mentioned in your June 20 letter, was never drilled, an application for this well is not submitted.

Should you have questions regarding the application, please contact the undersigned.

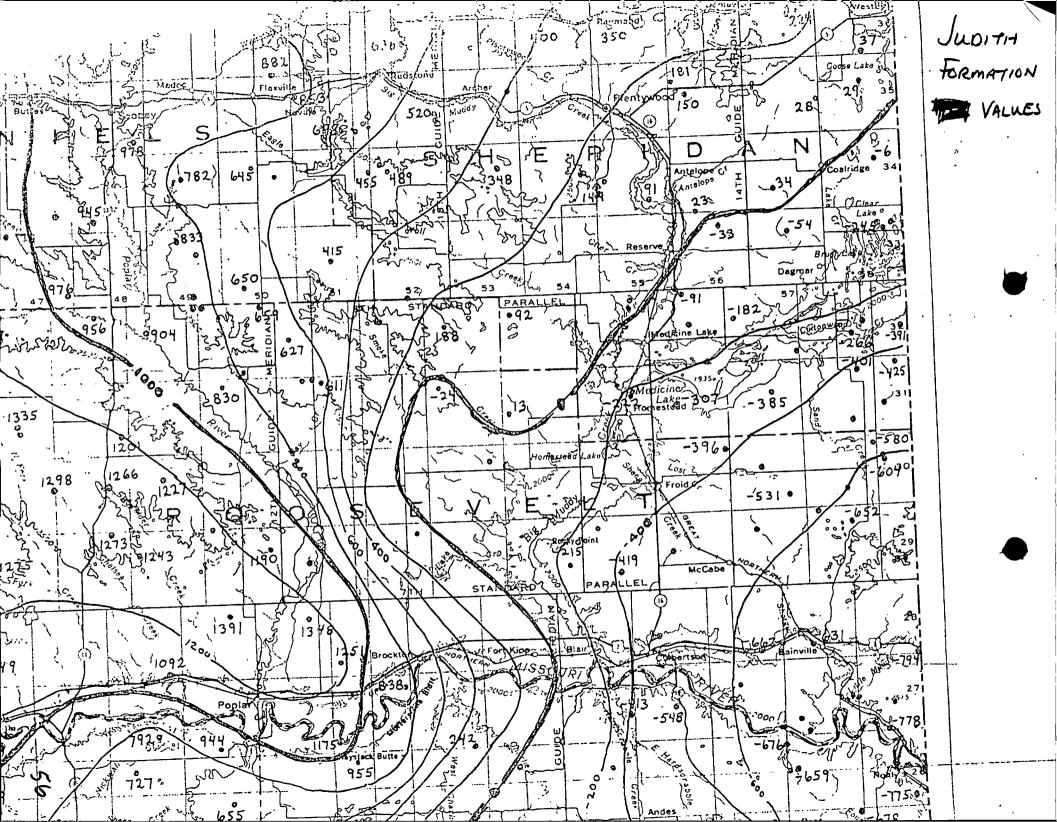
Very truly yours,

CENTURY OIL & GAS CORPORATION

Jack B. McWilliams Production Manager

JBM/kw Enclosures

	RECORD OF COMMUNICATION	THER (SPECIFY)					
	COMMUNICATION	(Record of item chec	kad abours)				
0:		FROM:	DAT5 11/84				
	Richard Long	Jack Mc Williams (694-	1538)				
		Century Oil & Gas	1 £ 30 pm				
NBJE							
	Century's applications	for permits					
MM/	ARY OF COMMUNICATION						
ONCI	per our letter of June SIC code portion of the and looked up the code no 1311. I called him	tting together his applicate 25. He needed to know how he application form. I went is. Crude oil production ad back with the information. not expect any problems in te.	to fill out the to the library d natural gas is I indicated at				
ONC	LUSIONS, ACTION TAKEN OR REQUIRED						





Alluvium

Alluvium

Mainly valley fill consisting of silt, sand, and gravel; includes some terrace deposits and glacial drift of Pleistocene age in some areas; locally includes hot spring tufa. The older part of the alluvium, where present, is probably of Pliocene age.

QgI

Glacial lake deposits Mainly silt; believed to have been deposited in lakes formed behind temporary dams of ice or morainal deposits.

> Ter Gravel, sand, an

Tertiary sedimentary in undifferentiated. Clastic deposits in western Monta in valleys, and in most places in into formations; mostly poord dated gravel, sand, sill, and classome tu ffaceous material and the es of lignite and bentonile; a spring tufa; and in areas not yin detail, lava may be included. There is part was formed in streams and fans. These rocks are Tertiary in as now mapped may even included of Cretaceous age. Some late terrace deposits may be included.

The with mart and

ok formation

11 (19)

c. chiefly maroon to chocolate gray nodular limistone.

has brome and crossbedded

trained brownish cliff-

Glacial drift Morainal and outwash plain deposits of mountain glaciers; and sand; may include alluvium in places.

Arikaree formation

Gray sandstone with layers of concretions; contains volcanic ash and, locally, channels filled with conglomerate; known only in southeastern Montana.

Twr 0

White River formation Light-colored clay with minor beds of sandstone and local beds of nodular limestone.

Tw

Wasatch formation

Light-colored massive sandstone; drab-colored shale and coal in southeastern Montana; and variegated, dominantly red beds of clay and sandstone in north-central Montana.

Tfu

Fort Union formation

Clay shale, silistone, and sandstone; local lenses of impure lime-stone, and numerous lignitic beds; contains Tertiary plant and animal fossils but no dinosaurs; base generally placed at the lowest of the succession of lignite beds within it; includes the Tongue River member, Lebo shale member, and Tullock member.

Khc

Hell Creek formation

Somber-gray sandstone and greenish shaly clay and mudstone containing dinosaur bones; a few thin lignite and subbituminous coal beds.

MfH

Fox Hills sandstone Typically shaly sandstone grading upward into massive brownish sandstone with white sandstone of the Colgate member locally

Bearpaw shale

Dark-gray and brownish clay shale: thick units of nonfissile bentonitic shale; calcareous and ferruginous concretions throughout; contains some thick bentonite beds.

Judith River formation

Light-colored sandstone at top; lower third somber-gray silistone and sandy shale; greenish-gray clay and some lightle beds; includes the Parkman sandstone member of south-central Montana.

Claggett formation

Chiefly dark-gray shale with iron-stained concretions; locally sandstone present; numerous bentonite beds near base.

Keu

Kp.

Pierre shale Dark-gray clay shale with calcared ferruginous concretions and sandy m

and group, undifferentiated sanctione and shele, soft and in socity consolidated, some coal; shown and only in areas where detailed electing and in these areas some to Mentana age may have been particular, rocks designated critiary strata.

Km

Judith River formation Light-colored sandstone at top; lower third somber-gray site and sandy shale; greenish-gray clay and some lightly includes the Parkman sandstone member of south-officers.



Claggett formation
fly dark-gray shale with iron-stained concretions; locally
sandstone present; numerous bentonite beds near base. Chiefly dark-gray shale



Eagle sandstone
and shaly sandstone with lignite beds in basal part of
apper unit (Keu). The Virgelle sandstone member (Kvi) at base
is distinguished where possible. Near Yellowstone National
regarded as incorrectly called Laramie in early reports and now
leafatively mapped as Eagle sandstone.



Telegraph Creek formation
mainly soft, fissile sandy shale with subordinate amounts of
concretionary sandstone.



Nicbrara formation ply calcorcous shale with limestone concretions; many thin bentonite beds locally.



Carlile shale s-gray shole with calcureous and ferruginous concretions; middle part commonly sandy.



Greenhorn formation Mainly light-gray marl and calcar



Belle Fourche shale sticeous shale with many calcareous and ferru-elions and intercalated thin layers of bentonite.



Pierre shale Dark-gray clay shale with calcareous and ferruginous concretions and sandy members.



Basal part of Cody shale Gray and dark-gray shale with some sandstone beds; in north end of Big Horn Basin includes the Telegraph Creek formation.



Frontier formation Mainly gray sandy shale; locally Torchlight sandstone member constitutes upper third and thinner Peay sandstone member is at base; contains some thick beds of bentonite.



shale

Mowry shale
Chiefly light-gray silicified shale and claystone with minor
amounts of sandy shale and sandstone; contains some thick
beds of bentonite.



Thermopolis shale

Dark-gray shale with some sandstone. The subsurface consists of
Muddy sandstone member or Newcastle sandstone member at
top, Skull Creek shale member in middle, and Fall River
sandstone or First Cat Creek sand of drillers at base.



Idaho batholith and associated masses Idaho batholith and associated masses Faintly gneissic quartz monsonite, granodiorite, and similar rocks. The extreme eastern part of the Idaho batholith extends into Ravalli County, Mont. This and nearby masses of similar rocks are shown as associated with the Idaho batholith and designated Ki. Future studies may show that some granitold masses farther east are also allied to the Idaho batholith or that a few of the masses now grouped with that batholith are younger. Precise dating is impossible at present.



Colorado Dark-gray shale and silistom and sandy units. Includes e Skull Creek, Newcastle, I Greenhorn, Carlile, and N locally Telegraph Creek form known areas beds of other age

Dark, moderately fine grained bodies; not readily disting ages. Hence in the less we ment may remain. These re

Diorite



Border zone of Idaho bat associated masse

Granitic gneiss and sedimentary rocks, m pregnated with granitic material. Because they are not distinguished around some masses that have such border zonce.

ai formation and associated rocks

undifferentiated

Thermopolis shale

Dark-gray shale with some sandstone. The subsurface consists of the sandstone member or Newcastle sandstone member of Skull Creek shale member in middle, and Fall Riverstone or First Cat Creek sand of drillers at base.

Kk

Kootenai formation and associated rocks Conglomerate, sandstone, shale, and mudstone; purplish and Montana includes strata that have been mapped as Cloverly formation. Includes Second Cat Creek and Third Cat Creek ands of drillers in central part of State; Sunburst sand of drillers in north-ceitral part; and Cut Bank sand of drillers in western part. As here mapped, may locally include thin units of Jurassic age.



Jurassic, undifferentiated

Calcareous shale and sandstone; includes the Morrison formation, the Ellis group, Sundance formation, and other rocks of Jurassic age.



Triassic, undifferentiated

Conglomerate, sandstone, shale, and impure limestone belonging to the Dinwoody and Thaynes formations and other units of Triassic age, and the Chugwater of Triassic and Permian age.



Permian, undifferentiated
Chari, sandstone, limestone, quartzite, and shale with rock
pliosphale mostly at base; mainly Phosphoria formation.



Pennsylvanian, undifferentiated
In western Mondona is mainly the Quadrant quartitle but includes
timestone and other rocks of Pennsylvanian age so far as
present data permit. Farther east other formations of Pennsylvanian or possible Pennsylvanian age are included.



Mississippian, undifferentiated
Sandstone, shale, and limestone, in part dolomitic, with chert
modules, some quartitie; includes Big Snowy group in central
part of State, Madison group in central and southwestern
part; may include small amounts of Pennsylvanian rocks in
areas where stratigraphic studies are incomplete.



Devonian, undifferentiated

omprises Three Forks formation consisting of carbonaceous and

comes shale with some sandstone and limestone, Jefferson

one, and sanamed units of Devonian age.



Ordevician, undifferentiated Sighorn dolorite; near Idaho, Kinnikinic quartzite.



Cambrian, undifferentiated

or formation, in south-central Montana, and

from. Dry Creek shale, Hasmark formation,

shale, Fitted formation, Park shale, Meagher

shale, Flathead quartzite, and other units.

The sourtzite of Cambrian age may be mapped

or quartzite of Belt age with the Cambrian



Assoula group

purple argillite; sandy or quartritic representation of the sign impure quartrite and limestone. The masses are similar to the Siyeh limestone of the Missoula group includes numerous most of which cannot be traced with continuity type localities. Among these are the Marsh the living region, the Striped Peak and Libby formations, for near Missoula and others.



Idaho batholith and associated masses
Faintly gneissic quartz monzonite, granodiorite, and similar
rocks. The extreme eastern part of the Idaho batholith extends
into Ravalli County, Mont. This and nearby masses of similar
rocks are shown as associated with the Idaho batholith and
designated Ki. Future studies may show that some graviloid
masses farther east are also allied to the Idaho batholith or that
a few of the masses now grouped with that batholith are younger.
Precise dating is impossible at present.

Border

Granitic gneiss and pregnated with gr they are not dist masses that have

O peb

Purcell basalt

Dark greenish-gray altered effusive basalt; in Glacier
National Park it is near base of Missoula group;
but in other localities, mainly in Canada, it is reported in other stretturance reactions.

4